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**UNITED STATES DISTRICT COURT
 DISTRICT OF NEW JERSEY**

<hr/>	:	CIV. A. No. 3:20-CV-08267-ZNQ-TJB
CHRISTINE CONFORTI, et al.,	:	
	:	
Plaintiffs,	:	CIVIL ACTION
	:	
CHRITINE GIORDANO HANLON,	:	RESPONSE TO PLAINTIFFS’
In her official capacity as Monmouth	:	STATEMENT OF UNDISPUTED
County Clerk, et al	:	MATERIAL FACTS and
	:	COUNTER-STATEMENT OF FACTS
Defendants.	:	
<hr/>	:	
ANDY KIM et al.,	:	CIV. A. No. 3:24-CV-10987-ZNQ-TJB
	:	
Plaintiffs,	:	
	:	CIVIL ACTION
CHRITINE GIORDANO HANLON,	:	
In her official capacity as Monmouth	:	
County Clerk, et al	:	
Defendants.	:	
<hr/>	:	

The Defendant John S. Hogan as Bergen County Clerk in the above-captioned cases, in opposition to Plaintiff’s motions for summary judgment in each of the respective cases, present this Response to Plaintiff’s Statement of Undisputed Material Facts says as follows:

Pursuant to NJ Federal Local Rule 56.1, for purposes of the summary judgment motions, Defendant John S. Hogan does not dispute any of the Facts set forth in Plaintiffs’ Statement of

Undisputed Material Facts and further states that the Facts set forth therein are irrelevant and immaterial to the disposition of the summary judgment motion.

**DEFENDANT JOHN S. HOGAN'S COUNTER-STATEMENT
OF MATERIAL FACTS**

Defendant John S. Hogan further states that Plaintiff's Statement of Undisputed Material Facts omits a material fact, which is the enactment of legislation that supersedes, and renders moot, the legislation that created the Bracketing Structure (as defined in Plaintiff's Statement of Undisputed Material Facts).

Respectfully submitted,

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By: Jason S. Nunnermacker

Dated: March 19, 2025